

EDWARD H. KUBO, JR. 2499
United States Attorney
District of Hawaii

J. MICHAEL SEABRIGHT 3764
Assistant U.S. Attorney

LAWRENCE L. TONG 3040
Assistant U.S. Attorney
Room 6-100, PJKK Federal Building
300 Ala Moana Blvd., Box 50183
Honolulu, Hawaii 96850
Telephone: (808) 541-2850
Facsimile: (808) 541-2958
E-mail: Larry.Tong@usdoj.gov

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

AUG 25 2004
at 10:00 a.m. *Yan*
WALTER A. Y. H. CHIN, CLERK

Attorneys for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 04-00180 HG
)	
Plaintiff,)	SUPERSEDING INDICTMENT
vs.)	
)	18 U.S.C. § 1344
RENAN GRECIA (01),)	[Bank Fraud]
DARIA CHANG (02),)	
KALANI ALAPAI (03),)	
)	
Defendants.)	
)	

SUPERSEDING INDICTMENT

COUNTS 1-10

The Grand Jury charges:

1. Beginning at a precise earlier date not known to the Grand Jury, but by December 31, 2000, and continuing through on or about April 23, 2001, in the District of Hawaii, RENAN GRECIA, defendant herein, did knowingly execute, and attempt to

execute, a scheme and artifice to defraud the Bank of Hawaii, a financial institution whose deposits are insured through the Federal Deposit Insurance Corporation (FDIC), and to obtain money, funds and credits owned by and under the custody and control of said Bank of Hawaii by means of materially false and fraudulent pretenses and representations, and the omission of material facts, all as more fully set forth below.

2. It was part of the scheme and artifice to defraud that RENAN GRECIA obtained the account numbers of bank accounts maintained by businesses and entities at the Bank of Hawaii. Using a home computer, GRECIA printed counterfeit checks bearing those accounts numbers. GRECIA made some of the checks appear to be corporate payroll checks, and made them payable to various individuals. GRECIA printed other checks which purported to be drawn on individual accounts, but which bore the account numbers of businesses and other entities. GRECIA made these checks appear as if they were genuine, whereas GRECIA knew they were forged.

3. It was further a part of the scheme and artifice to defraud that GRECIA negotiated some checks, and gave other checks to other individuals to cash or use. In so doing, GRECIA knew that the checks would be presented for payment as if they were real, whereas they were actually forged and had been made without the authorization of the true account holders.

4. By virtue of the foregoing conduct, GRECIA caused the Bank of Hawaii to sustain losses of more than \$120,000.

5. On or about the dates set forth below, in the District of Hawaii, RENAN GRECIA did knowingly execute, and attempt to execute, the aforesaid scheme and artifice to defraud Bank of Hawaii by negotiating, and causing the negotiation of, the following counterfeit checks, with each such check constituting a separate count of this Superseding Indictment:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION OF CHECK</u>
1	1/4/01	Counterfeit check purportedly drawn on the account of ITS Hawaii, and made payable to Sears in the amount of \$2,871.45
2	1/4/01	Counterfeit check purportedly drawn on the account of ITS Hawaii, and made payable to Sears in the amount of \$3,328.52
3	1/10/01	Counterfeit check purportedly drawn on the account of ITS Hawaii, and made payable to Dean Watanabe in the amount of \$2,000.00
4	1/11/01	Counterfeit check purportedly drawn on the account of ITS Hawaii, and made payable to Dean Watanabe in the amount of \$1,500.00
5	1/19/01	Counterfeit check purportedly drawn on the account of Ronald Van Keuren, and made payable to Dean Watanabe in the amount of \$1,600.00
6	1/27/01	Counterfeit check purportedly drawn on the account of Renan H. Grecia and made payable to Home Depot in the amount of \$161.56

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION OF CHECK</u>
7	1/27/01	Counterfeit check purportedly drawn on the account of Renan H. Grecia and made payable to City Mill in the amount of \$224.36
8	1/31/01	Counterfeit check purportedly drawn on account of Renan H. Grecia and made payable to Safeway in the amount of \$36.94
9	3/15/01	Counterfeit check purportedly drawn on the account of ITS Hawaii, and made payable to Louie Lazo in the amount of \$2,624.42
10	3/22/01	Counterfeit check purportedly drawn on the account of ITS Hawaii, and made payable to Jacqueline Arthur in the amount of \$3,298.50

All in violation of Title 18, United States Code, section 1344.

COUNTS 11-44

The Grand Jury further charges:

6. Paragraphs 1-3 of the Superseding Indictment are realleged and incorporated herein by reference.

7. It was further a part of the scheme and artifice to defraud that RENAN GRECIA and DARIA CHANG, defendants herein, cashed various counterfeit checks. The checks purported to be legitimate checks made payable to CHANG, whereas, as both GRECIA and CHANG knew, they were forged and not authorized by the true account holders.

8. On or about the dates set forth below, in the District of Hawaii, DARIA CHANG and RENAN GRECIA did knowingly execute, and attempt to execute, the aforesaid scheme and artifice to defraud Bank of Hawaii by negotiating, and causing the negotiation of, the following counterfeit checks, with each such check constituting a separate count of this Superseding Indictment:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION OF CHECK</u>
11	1/20/01	Counterfeit check purportedly drawn on the account of Sprint Com and made payable to Daria Chang in the amount of \$150
12	1/21/01	Counterfeit check purportedly drawn on the account of Sprint Com and made payable to Daria Chang in the amount of \$2,500
13	1/21/01	Counterfeit check purportedly drawn on the account of Sprint Com and made payable to Daria Chang in the amount of \$1,095
14	1/22/01	Counterfeit check purportedly drawn on the account of Sprint Com and made payable to Daria Chang in the amount of \$1,150
15	1/27/01	Counterfeit check purportedly drawn on the account of Sprint Com and made payable to Daria Chang in the amount of \$640
16	1/29/01	Counterfeit check purportedly drawn on the account of Sprint Com and made payable to Daria Chang in the amount of \$775

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION OF CHECK</u>
17	2/2/01	Counterfeit check purportedly drawn on the account of Sprint Com and made payable to Daria Chang in the amount of \$720
18	2/7/01	Counterfeit check purportedly drawn on the account of Sprint PCS and made payable to Daria Chang in the amount of \$650
19	2/7/01	Counterfeit check purportedly drawn on the account of Sprint PCS and made payable to Daria Chang in the amount of \$675
20	2/14/01	Counterfeit check purportedly drawn on the account of ITS Hawaii and made payable to Daria Chang in the amount of \$650
21	2/16/01	Counterfeit check purportedly drawn on the account of ITS Hawaii and made payable to Daria Chang in the amount of \$380
22	2/17/01	Counterfeit check purportedly drawn on the account of ITS Hawaii and made payable to Daria Chang in the amount of \$425
23	2/20/01	Counterfeit check purportedly drawn on the account of ITS Hawaii and made payable to Daria Chang in the amount of \$680
24	2/23/01	Counterfeit check purportedly drawn on the account of ITS Hawaii and made payable to Daria Chang in the amount of \$725
25	2/23/01	Counterfeit check purportedly drawn on the account of ITS Hawaii and made payable to Daria Chang in the amount of \$710

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION OF CHECK</u>
26	2/24/01	Counterfeit check purportedly drawn on the account of ITS Hawaii and made payable to Daria Chang in the amount of \$650.47
27	2/28/01	Counterfeit check purportedly drawn on the account of Sprint PCS and made payable to Daria Chang in the amount of \$615.65
28	3/1/01	Counterfeit check purportedly drawn on the account of Sprint PCS and made payable to Daria Chang in the amount of \$630
29	3/2/01	Counterfeit check purportedly drawn on the account of Sprint PCS and made payable to Daria Chang in the amount of \$782
30	3/2/01	Counterfeit check purportedly drawn on the account of ITS Hawaii and made payable to Daria Chang in the amount of \$780.05
31	3/2/01	Counterfeit check purportedly drawn on the account of ITS Hawaii and made payable to Daria Chang in the amount of \$1,436.51
32	3/5/01	Counterfeit check purportedly drawn on the account of ITS Hawaii and made payable to Daria Chang in the amount of \$680.23
33	3/9/01	Counterfeit check purportedly drawn on the account of ITS Hawaii and made payable to Daria Chang in the amount of \$1,820.05
34	3/9/01	Counterfeit check purportedly drawn on the account of Sky Chefs and made payable to Daria Chang in the amount of \$1,260.00

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION OF CHECK</u>
35	3/12/01	Counterfeit check purportedly drawn on the account of ITS Hawaii and made payable to Daria Chang in the amount of \$794.05
36	3/15/01	Counterfeit check purportedly drawn on the account of ITS Hawaii and made payable to Daria Chang in the amount of \$4,025.05
37	3/15/01	Counterfeit check purportedly drawn on the account of ITS Hawaii and made payable to Daria Chang in the amount of \$740.10
38	3/15/01	Counterfeit check purportedly drawn on the account of ITS Hawaii and made payable to Daria Chang in the amount of \$2,410.05
39	3/27/01	Counterfeit check purportedly drawn on the account of ITS Hawaii and made payable to Daria Chang in the amount of \$750.00
40	3/30/01	Counterfeit check purportedly drawn on the account of ITS Hawaii and made payable to Daria Chang in the amount of \$784.10
41	3/31/01	Counterfeit check purportedly drawn on the account of ITS Hawaii and made payable to Daria Chang in the amount of \$745.10
42	4/5/01	Counterfeit check purportedly drawn on the account of ITS Hawaii and made payable to Daria Chang in the amount of \$742.10
43	4/6/01	Counterfeit check purportedly drawn on the account of ITS Hawaii and made payable to Daria Chang in the amount of \$745.10

44 4/6/01 Counterfeit check purportedly drawn on the account of Hawaiian Airlines and made payable to Daria Chang in the amount of \$740.10

All in violation of Title 18, United States Code, section 1344.

COUNTS 45-57

The Grand Jury further charges:

9. Paragraphs 1-3 of this Superseding Indictment are realleged and incorporated herein by reference.

10. It was further a part of the scheme and artifice to defraud that RENAN GRECIA and KALANI ALAPAI, defendants herein, wrote and used various counterfeit checks. The checks purported to be legitimate checks drawn on an account maintained by ALAPAI, whereas they were actually counterfeit checks bearing the account numbers of other businesses or entities. GRECIA and ALAPAI intended that the checks would be presented to merchants as if they were legitimate, even though they knew the checks were forged and not authorized by the true account holders.

11. On or about the dates set forth below, in the District of Hawaii, KALANI ALAPAI and RENAN GRECIA did knowingly execute, and attempt to execute, the aforesaid scheme and artifice to defraud Bank of Hawaii by writing and presenting the following counterfeit checks to merchants, with each such check constituting a separate count of this Superseding Indictment:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION OF CHECK</u>
45	1/4/01	Counterfeit check purportedly drawn on account of Kalani Alapai, but bearing the account number of ITS Hawaii, and made payable to Hiram Chevron in the amount of \$120.00
46	1/4/01	Counterfeit check purportedly drawn on account of Kalani Alapai, but bearing the account number of ITS Hawaii, and made payable to Roof Top Lot in the amount of \$720.00
47	1/4/01	Counterfeit check purportedly drawn on the account of Kalani Alapai, but bearing the account number of ITS Hawaii, and made payable to Hiram Chevron in the amount of \$150.00
48	1/4/01	Counterfeit check purportedly drawn on the account of Kalani Alapai, but bearing the account number of ITS Hawaii, and made payable to Sears in the amount of \$200.00
49	1/5/01	Counterfeit check purportedly drawn on the account of Kalani Alapai, but bearing the account number of ITS Hawaii, and made payable to Hiram Chevron in the amount of \$150.00
50	1/8/01	Counterfeit check purportedly drawn on the account of Kalani Alapai, but bearing the account number of ITS Hawaii, and made payable to Sprint in the amount of \$125.00
51	1/28/01	Counterfeit check purportedly drawn on the account of Kalani Alapai, but bearing the account number of Sprint, and made payable to Home Depot in the amount of \$200.00

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION OF CHECK</u>
52	1/28/01	Counterfeit check purportedly drawn on the account of Kalani Alapai, but bearing the account number of Sprint, and made payable to Footaction in the amount of \$208.24
53	1/28/01	Counterfeit check purportedly drawn on the account of Kalani Alapai, but bearing the account number of Sprint, and made payable to Home Depot in the amount of \$241.56
54	1/30/01	Counterfeit check purportedly drawn on the account of Kalani Alapai, but bearing the account number of Sprint, and made payable to Home Depot in the amount of \$235.60
55	1/31/01	Counterfeit check purportedly drawn on the account of Kalani Alapai, but bearing the account number of Sprint, and made payable to Home Depot in the amount of \$308.25
56	2/1/01	Counterfeit check purportedly drawn on the account of Kalani Alapai, but bearing the account number of Sprint, and made payable to Petland in the amount of \$151.72
57	2/3/01	Counterfeit check purportedly drawn on the account of Kalani Alapai, but bearing the account number of Sprint, and made payable to Safeway in the amount of \$204.55

All in violation of Title 18, United States Code, section 1344.

SENTENCING ALLEGATIONS

(a) The offenses alleged in counts 1-57 of this Superseding Indictment involved more than minimal planning.

(b) With respect to the scheme charged in counts 1-10 of the Superseding Indictment, the losses were more than \$120,000, but less than \$200,000.

(c) With respect to the scheme charged in counts 11-44 of the Superseding Indictment, the losses were more than \$20,000 but less than \$40,000.

(d) With respect to the scheme charged in counts 45-57 of the Superseding Indictment, the losses were more than \$2,000 but less than \$4,000.

(e) Defendant RENAN GRECIA was an organizer, leader, manager and supervisor in the criminal activity charged in all counts of this Superseding Indictment.

DATED: AUG 25 2004, at Honolulu, Hawaii.

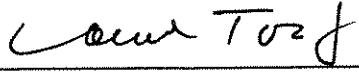
A TRUE BILL

151

FOREPERSON, Grand Jury

EDWARD H. KUBO, JR.
United States Attorney
District of Hawaii


J. MICHAEL SEABRIGHT
Assistant U.S. Attorney


LAWRENCE L. TONG
Assistant U.S. Attorney

United States v. Renan Grecia, et al.
Cr. No. 04-00180 HG
"Superseding Indictment"